

Tuesday Tips is a new outreach effort by OGCA. The idea behind Tuesday Tips is to convey tips, tricks and other helpful information around the area of research administration. Our goal is to post on (almost every) Tuesdays. If there is something you would like to see covered on Tuesday Tips, email: UAF-GCReATE@alaska.edu. For more Tips visit OGCA website.

Can I charge administrative or clerical salaries directly to my sponsored project?

Under federal regulations and sponsor requirements, general administrative expenses including but not limited to administrative or clerical salaries, office supplies, postage, local telephone costs, photocopy costs, network charges, telecom infrastructure and, cell phones, etc. should normally be treated as a F&A cost and recovered through the F&A cost rate (also known as indirect cost rate).

In exceptional circumstances where the nature of the work performed requires extensive departmental support (defined as an unlike circumstance) the F&A type cost may be treated as a direct charge. However, costs such as administrative or clerical salaries and other general administrative costs must directly benefit and be easily identified with the particular sponsored project.

Principal Investigators and department administrators must ensure that the direct charging of F&A type costs must comply with sponsor requirements, University policy, and the applicable cost principles, 2 CFR Part 200.

Administrative/Clerical Staff Expenses:

This guidance is issued to define the appropriate charging of administrative or clerical salaries and other general administrative expenses consistent with <u>2 CFR Part 200</u> Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

The direct charging of administrative or clerical salaries may be appropriate where the nature of the work performed under a particular project requires an extensive amount of administrative or clerical support which is significantly greater than the routine level of such services provided by the academic department.

Examples of circumstances where the direct charging of salaries of administrative or clerical staff and other department expenses may be appropriate are as follows:

- Large complex programs, such as Program Projects, environmental research centers, engineering research centers, and other grants and contracts that entail assembling and managing teams of investigators from a number of institutions.
- Projects which involve extensive data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting (such as epidemiological studies, clinical trials, and retrospective clinical records studies).
- Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences and seminars.
- Projects whose principal focus is the preparation and production of manuals and large reports, books and monographs (excluding routine progress and technical reports).
- Projects that are geographically inaccessible to normal departmental administrative services, such as research vessels, radio astronomy projects, and other research field sites that are remote from campus.
- Individual projects requiring project-specific database management; individualized graphics or manuscript preparation; human or animal protocols; and multiple project-related investigator coordination and communications.

The examples above are illustrative of the same criteria that are applied to the treatment of items such as office supplies, postage, local telephone costs, photocopying, network charges, cell phones, etc. Direct charging of such expenses may be justifiable when the expenses are related specifically

to the technical substance of a project or there is an unusually high level of expense because of the nature of the activity.

Conditions Under Which Administrative or Clerical Salaries May be Charged Directly:

The charging of administrative or clerical salaries may be appropriate *ONLY IF ALL* of the following conditions are met:

- 1. Administrative or clerical services are *integral* to the particular project; meaning the services are essential to the project's goals and objectives;
- 2. Individuals involved can be specifically identified with the particular project;
- 3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
- 4. The costs are not also recovered as indirect costs.

Care should be exercised to ensure costs incurred for the same purpose in like circumstances are treated consistently as either a direct or F&A cost. For example, salaries of technical staff, laboratory supplies, animals, animal care costs, travel costs, and specialized service center costs should be treated as direct costs whenever identifiable to a particular cost objective. Other general administrative items such as office supplies, postage, and memberships should normally be treated as F&A costs unless:

- The expenses are essential, vital, or fundamental to the project's goals and objectives; and
- Such costs are explicitly included in the budget and budget justification or if required by the sponsor's terms and conditions, received prior approval of the sponsor.

F&A type costs *not* requiring the prior approval of the sponsor must be documented. The Principal Investigator and the unit should have the documentation retained in the department's file for audit purposes.

Additional information can be found in the University of Alaska Accounting and Administrative Manual: <u>Section 100: D-05 Accounting for Administrative</u> or Clerical Services on Sponsored Projects

Additional information can be found on OGCA's website: https://www.uaf.edu/ogca/lifecycle/6-management/managing_financial/